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NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

September 3, 1998

Mr. Dave Fowler
Executive Director of
Jackson County
401 Grindstaff Cove
Sylva, N.C. 28779

Post-it® Fax Note	7671	Date	<i>9-9-98</i>	# of pages	<i>2</i>
To	<i>Jeff Bishop</i>		From	<i>M. Poinexter</i>	
Co./Dept.	<i>McGill</i>		Co.	<i>NCDENR-DNM</i>	
Phone #	<i>828-252-2518</i>		Phone #	<i>919-733-0682</i>	
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Re: Implementation of Groundwater Assessment and Corrective Action
Requirements (Permit #50-02).

Dear Mr. Fowler,

The Solid Waste Section is in receipt of the August 25, 1998 letter submitted on behalf of Jackson County by McGill Associates. In response to that letter the Section offers the following comments as reasons why the County should not further delay the implementation of the remaining requirements of .1634. After completing the requirements of .1634 it will then be determined if it is necessary to implement the requirements in .1635 (Assessment of Corrective Measures), .1636 (Selection of a Remedy), and .1637 (Implementation of the Corrective Action Program).

- 1) The water quality data collected to date confirms the landfill has had an affect on the groundwater for some time. While the recently installed landfill cap will likely reduce further degradation of the groundwater it will have little effect on the groundwater contamination already present.
- 2) The County is required to compare, using the approved statistical procedures, the concentration of the Appendix II constituents to the groundwater protection standards to ascertain if further action is necessary. If so, the following step must be taken:
 - a) Since the extent of the contaminant plume is not known at this time, delineation of the contaminant plume(s), vertically and horizontally, is required. Rule .1634 (g) requires characterization of the nature and extent of any release. In addition, characterization of the plume and continued monitoring would be useful in assessing the effectiveness of the cap in the future.
- 3) The effect the private wells on properties adjacent to the landfill are having on local groundwater flow also needs to be determined.

The closure and capping of the landfill is a requirement for all unlined municipal solid waste landfills and is not considered corrective action. Only after the requirements of .1634 have been fulfilled can a corrective action plan

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be developed to address the contaminated groundwater.

The Section was unaware of Mr. Cabe's departure from the County's government. Since the letter was not forwarded to Mr. Cabe's successor the Section will extend the deadline for item #2 and if required, a plan for #2a, for 60 days.

If you have any questions, please contact me at (919) 733-0692, extension 261.

Sincerely,



Mark Poindexter, Hydrogeologist
Groundwater Compliance Unit
Solid Waste Section

c: Philip Prete
Julian Foscue
Jim Patterson
central file

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